BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE REGULATORY AUTHORITY REGULATORY AUTH.

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IN RE: In the Matter of Petition Of Tennessee

UNE-P Coalition To Open Contested Case

Proceeding To Declare Unbundled Switching

An Unrestricted Unbundled Network Element

OFFICE OF THE

Docket No. 02-00207 CUTIVE SEGRETARY

AGREED MOTION FOR CONTINUANCE

The Tennessee UNE-P Coalition¹ ("Coalition") requests that the parties be granted additional time to file objections to discovery requests and to respond to discovery requests and that the dates for filing direct and rebuttal testimony be amended accordingly. Because of the number of carrier in the Coalition, each filing requires coordination and consultation among a large number of people. This process has been made more difficult by the Memorial Day holiday which resulted in some members of the Coalition not being able to review BellSouth's discovery requests, which were filed on Friday, May 24, 2002, until Tuesday or Wednesday of the following week. Furthermore, those request are quite detailed and the Coalition members are still in the process of determining what information is, or is not, available. Finally, the process of gathering the requested information is going to take substantially more time than allowed in the existing schedule.

For these reasons, the Coalition request that (1) the filing of objections to discovery be delayed from Friday, May 31, to Wednesday, June 5 and (2) that the filing of responses to discovery be delayed two weeks, from Friday, June 7 to Friday, June 21.

The Coalition includes: Access Integrated Network, Inc.; Birch Telecom of the South, Inc.; Ernest Communications, Inc.; MCEmetro Access Transmission Services, LLC; MCI WorldCom Communications, Inc.; NewSouth Communications Corp.; and Z-Tel Communications, Inc.

If these delays are granted, the Hearing Officer should also revise the dates for filing testimony. The Coalition proposes that direct testimony be filed on Wednesday, July 10 and that rebuttal be filed on Wednesday, July 17.

As previously stated, BellSouth has no objections to these proposed dates.

Respectfully submitted,

Henry Walker

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 31st day of May, 2002.

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Joelle Phillips, Esq. BellSouth Telecommunications, Inc. 333 Commerce St., Suite 2101 Nashville, TN 37201-3300

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